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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ARCHER WESTERN CONTRACTORS, LLC  
a Delaware foreign limited-liability company

Plaintiff,

vs.

THE ERECTION COMPANY, INC., a  
Washington Corporation

and

TRAVELERS CASUALTY AND SURETY  
COMPANY OF AMERICA, a Connecticut  
Corporation

Defendants.

Case No: 2:17-cv-03032-GMN-DJA

**STIPULATION AND ORDER FOR  
DISMISSAL WITH PREJUDICE OF ALL  
CLAIMS AGAINST DEFENDANTS THE  
ERECTION COMPANY, INC. AND  
TRAVELERS CASUALTY AND SURETY  
COMPANY OF AMERICA**

Pursuant to L.R. 7-1, Plaintiff Archer Western Contractors, LLC (“AWC”) and Defendants The Erection Company (“TEC”), and Travelers Casualty & Surety Company of America (Bond No. 105707041) (“Travelers-TEC”) by and through their respective undersigned counsel, hereby file this joint stipulation and proposed order for dismissal of all AWC’s claims against TEC and Travelers-TEC, with prejudice, subject only to the limitations set forth in the Settlement Agreement.

**STIPULATION**

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2 1. On February 17, 2022, AWC, TEC, and Travelers- TEC memorialized the terms of a  
3 settlement in a written Settlement Agreement (the “Settlement Agreement”).

4 2. AWC, TEC, and Travelers- TEC move to dismiss TEC and Travelers-TEC from this  
5 case and the claims and counts among AWC, TEC, and Travelers-TEC with prejudice as AWC, TEC,  
6 and Travelers-TEC have resolved all disputes among them related to the facts or circumstances  
7 pleaded by AWC, TEC, and Travelers-TEC in this action.

8 3. AWC, on one hand, and TEC and Travelers-TEC, on the other hand, shall each bear  
9 their own costs and attorney’s fees.

10 4. This Stipulation and Order for Dismissal with Prejudice applies entirely to all claims  
11 and counts by, between, or among AWC, TEC, and Travelers-TEC.

12 5. Upon entry of this Stipulation and Order, this entire Case No. 2:17-cv-03032-GMN-  
13 DJA is hereby dismissed with prejudice.

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1 In light of the foregoing, it is hereby stipulated and agreed that all of AWC's claims asserted  
2 against TEC and Travelers-TEC are hereby dismissed with prejudice, subject only to the limitations  
3 set forth in the Settlement Agreement, with each side to bear its own costs and fees.

4 Respectfully submitted,

5 DATED this 24th day of February, 2022.

DATED this 24th day of February, 2022.

7 KEMP JONES, LLP

LAW OFFICES OF HAYES & WELSH

8 By: /s/ Nathanael R. Rulis  
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15 *Company of America*

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18 **IT IS SO ORDERED.**

19 **IT IS FURTHER ORDERED** that the Clerk is instructed to close the  
20 case.

21 Dated this 28 day of February, 2022.

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24 Gloria M. Navarro, District Judge  
25 UNITED STATES DISTRICT COURT  
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